

Honorable Judge Richard A. Jones

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

BOMBARDIER INC.,

Plaintiff,

v.

mitsubishi aircraft corporation,
mitsubishi aircraft corporation
america inc., aerospace testing
engineering & certification inc.,
michel korwin-szymanowski,
laurus basson, marc-antoine
delarche, cindy dornéval, keith
ayre, and john and/or jane does 1-
88,

Defendants.

No. 2:18-cv-01543-RAJ

DECLARATION OF BRIAN F.
MCMAHON IN SUPPORT OF
BOMBARDIER INC.'S
RESPONSE TO MITSUBISHI
AIRCRAFT CORPORATION
AMERICA INC.'S MOTION TO
SEAL

**NOTE ON MOTION
CALENDAR:
JANUARY 18, 2019**

I, Brian F. McMahon, declare as follows:

1. I am a Member at the law firm of Christensen O'Connor Johnson Kindness, and I represent Bombardier Inc. ("Plaintiff" or "Bombardier") in this matter. I have personal knowledge of the following:

2. Attached hereto as Exhibit A is a true and correct copy of an email exchange between counsel of record for Mitsubishi Aircraft Corporation America Inc. in this matter, and me spanning from December 20-21, 2018.

DECLARATION OF BRIAN F. MCMAHON IN
SUPPORT OF BOMBARDIER INC.'S RESPONSE
TO MITSUBISHI'S MOTION TO SEAL (2:18-cv-
01543-RAJ) - 1

CHRISTENSEN | O'CONNOR
JOHNSON | KINDNESS

1201 Third Avenue
Suite 3600
Seattle, WA 98101-3029
1.206.682.8100

1 3. Attached hereto as Exhibit B are Bombardier's proposed redactions to
2 Defendant Mitsubishi Aircraft Corporation America, Inc.'s Opposition to Plaintiff's Motion
3 for Preliminary Injunction (Dkt. No. 75).

4 4. Attached hereto as Exhibit C are Bombardier's proposed redactions to the
5 Declaration of Stephen Boyd (Dkt. No. 77) not including Exhibits to the Declaration.

6 5. Attached hereto as Exhibit D are Bombardier's proposed redactions to the
7 Declaration of Robert John Hansman Jr. (Dkt. No. 78) not including Exhibits to the
8 Declaration.

9
10 I declare under penalty of perjury that the foregoing is true and correct.

11
12 Dated this 14th day of January, 2019.

13
14 CHRISTENSEN O'CONNOR
15 JOHNSON KINDNESS^{PLLC}

16
17 s/ Brian F. McMahon

18 Brian F. McMahon, WSBA No.: 45,739
19 Christensen O'Connor Johnson Kindness^{PLLC}
20 1201 Third Avenue, Suite 3600
21 Seattle, WA 98101-3029
22 Telephone: 206.682.8100
23 Fax: 206.224.0779
24 E-mail: brian.mcmahon@cojk.com,
25 litdoc@cojk.com

26 *Attorney for Plaintiff Bombardier Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on January 14, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Jerry A. Riedinger PERKINS COIE LLP Email: JRiedinger@perkinscoie.com docketsea@perkinscoie.com lshaw@perkinscoie.com sporter@perkinscoie.com	Mack H. Shultz PERKINS COIE LLP Email: MShultz@perkinscoie.com docketseapl@perkinscoie.com sbilger@perkinscoie.com	Mary Z. Gaston PERKINS COIE LLP Email: MGaston@perkinscoie.com docketsea@perkinscoie.com jstarr@perkinscoie.com
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James Sanders PERKINS COIE LLP Email: JSanders@perkinscoie.com RBecken@perkinscoie.com docketsea@perkinscoie.com jdavenport@perkinscoie.com	Shylah R. Alfonso PERKINS COIE LLP Email: SAlfonso@perkinscoie.com docketsea@perkinscoie.com
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Attorneys for Mitsubishi Aircraft Corporation America Inc.

Richard J. Omata KARR TUTTLE CAMPBELL Email: romata@karrtuttle.com jnesbitt@karrtuttle.com swatkins@karrtuttle.com	Mark A. Bailey KARR TUTTLE CAMPBELL Email: mbailey@karrtuttle.com jsmith@karrtuttle.com mmunhall@karrtuttle.com sanderson@karrtuttle.com
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Attorneys for Aerospace Testing Engineering & Certification Inc., Michel Korwin-Szymanowski, Laurus Basson, and Cindy Dornéval

Daneil T. Hagen
KARR TUTTLE CAMPBELL
Email: dhagen@karrtuttle.com

s/Brian F. McMahon
John D. Denkenberger, WSBA No.: 25,907
Brian F. McMahon, WSBA No.: 45,739
E. Lindsay Calkins, WSBA No.: 44,127
Christensen O'Connor Johnson Kindness^{PLLC}
1201 Third Avenue, Suite 3600

1 Seattle, WA 98101-3029
2 Telephone: 206.682.8100
3 Fax: 206.224.0779
4 E-mail: john.denkenberger@cojk.com,
5 brian.mcmahon@cojk.com,
6 lindsay.calkins@cojk.com, litdoc@cojk.com

7 *Attorneys for Plaintiff Bombardier Inc.*
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DECLARATION OF BRIAN F. MCMAHON IN
SUPPORT OF BOMBARDIER INC.'S RESPONSE
TO MITSUBISHI'S MOTION TO SEAL (2:18-cv-
01543-RAJ) - 4

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JOHNSON | KINDNESS

1201 Third Avenue
Suite 3600
Seattle, WA 98101-3029
1.206.682.8100